

1 DAVID N. MAKOUS CA Bar No. 82409

dmakous@lbbslaw.com

2 MINA I. HAMILTON CA Bar No. 213917

hamilton@lbbslaw.com

3 **LEWIS BRISBOIS BISGAARD & SMITH LLP**

221 NORTH FIGUEROA STREET, SUITE 1200

4 LOS ANGELES, CA 90012

TELEPHONE: (213) 250-1800

5 FACSIMILE: (213) 250-7900

6 Attorneys for Plaintiffs TRAFFICSCHOOL.COM, INC.;  
DRIVERS ED DIRECT, LLC

7 ANDREW B. SERWIN CA Bar No. 179493

aserwin@foley.com

8 TAMMY H. BOGGS CA Bar No. 252538

tboggs@foley.com

9 **FOLEY & LARDNER LLP**

10 ATTORNEYS AT LAW

3579 VALLEY CENTER DR., SUITE 300

11 SAN DIEGO, CA 92130

TELEPHONE: 858.847.6700

12 FACSIMILE: 858.792.6773

13 Attorneys for Defendants EDRIVER, INC., ONLINE  
GURU INC., FIND MY SPECIALIST, INC.,  
14 SERIOUSNET, INC., RAVI K. LAHOTI, RAJ LAHOTI

15 **UNITED STATES DISTRICT COURT**

16 **CENTRAL DISTRICT OF CALIFORNIA**

17 TRAFFICSCHOOL.COM, INC., a  
18 California Corporation; DRIVERS ED  
19 DIRECT, LLC, a California limited  
liability company,

20 Plaintiffs,

21 v.

22 EDRIVER, INC., ONLINE GURU,  
INC., FIND MY SPECIALIST, INC.,  
23 and SERIOUSNET, INC., California  
corporations, RAVI K. LAHOTI, an  
24 individual; RAJ LAHOTI, an individual;  
DOES 1 through 10,

25 Defendants.

Case No: CV 06-7561 PA (CWx)

**STIPULATION AND JOINT  
REQUEST TO STAY PENDING  
DEADLINES; SUBMITTED WITH  
PROPOSED ORDER THEREON  
AND DECLARATION OF DANIEL  
C. DECARLO**

JUDGE: Hon. Percy Anderson  
COURTROOM: 15

1 THE PARTIES, BY AND THROUGH THEIR COUNSEL, STIPULATE  
2 AND JOINTLY MOVE THE COURT AS FOLLOWS:

3 On August 24, 2011, this Court issued an Order setting forth certain  
4 deadlines related to any Motion for Attorney's Fees, including dates for which a  
5 Motion is to be filed and heard by the Court. (Doc. No. 302.). The Court set a  
6 deadline of October 3 for any such motion to be filed. The Court also ordered the  
7 parties to file a joint status report concerning the parties' respective positions  
8 concerning disposition of the 9<sup>th</sup> Circuit's mandate concerning the issue of the  
9 permanent injunction. On September 6, 2011, the parties filed a joint status report  
10 in response to the Court's order. (Doc. No. 306).

11 NOW THEREFORE: After extensive discussions between the parties, the  
12 parties now stipulate and jointly move the court for an order staying this case for  
13 30 days so as to (1) continue the date that Plaintiffs must file their motion for  
14 attorneys' fees from the current deadline of October 3, 2011 to November 3, 2011  
15 and (2) to request that the Court take no action concerning the joint status report  
16 filed on September 6, 2011 (Doc. No. 306) until after November 3, 2011.

17 The parties have been engaging in settlement negotiations for several  
18 weeks, have exchanged multiple settlement offers, and have reached an agreement  
19 in principle on key terms. The parties intend to work diligently to conclude their  
20 settlement negotiations in the near future and anticipate that prior to November 3,  
21 2011, the parties will present to the Court a further stipulation outlining a proposed  
22 disposition of the case. In light of the recitals set forth above, the Parties therefore  
23 stipulate as follows:

- 24 1. This case be stayed for 30 days and all pending deadlines be  
25 vacated including that the deadline for Plaintiffs to file their  
26 motion for attorneys' fees, which was set for October 3, 2011, be  
27 vacated and continued until November 3, 2011;
- 28 2. That the Court not act on the joint status report filed by the parties

1 on September 6, 2011 (Doc. No. 306) until after November 3,  
2 2011.

3  
4 It is agreed.

5 Dated: September 28, 2011

**LEWIS BRISBOIS BISGAARD &  
SMITH LLP**

6 DAVID N. MAKOUS  
7 MINA L. HAMILTON  
8 DANIEL C. DE CARLO

9  
10 By: /s/ Daniel C. DeCarlo

11 DAVID N. MAKOUS  
12 Attorneys for Plaintiffs  
13 TRAFFICSCHOOL.COM, INC.,  
14 DRIVERS ED DIRECT, LLC

15 Dated: September 28, 2011

**FOLEY & LARDNER LLP**

16 ANDREW B. SERWIN  
17 TAMMY H. BOGGS

18 By: /s/ Andrew B. Serwin

19 ANDREW B. SERWIN  
20 Attorneys for Defendants  
21 EDRIIVER, INC., ONLINE GURU  
22 INC., FIND MY SPECIALIST, INC.,  
23 SERIOUSNET, INC., RAVI K.  
24 LAHOTI, RAJ LAHOTI  
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